

EXHIBIT

“P”

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ADRIAN SCHOOLCRAFT,

Plaintiff,

-against-

CITY OF NEW YORK,

Defendant.
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**DECLARATION OF
CHRISTOPHER D. GALIARDO**

10-CV-6005 (RWS)

CHRISTOPHER D. GALIARDO, an attorney admitted to practice in the State of New York, declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, as follows:

1. I am a partner at Myers, Singer & Galiardo, LLP. I submit this Declaration in support of the attorneys' fee application in the above matter by plaintiff's counsel, Jon L. Norinsberg, an attorney whom I have known for over a decade.

2. I graduated from the Boston University School of Law in 1990. I am a member of the New York and New Jersey state bars.

3. My practice specializes in bringing civil rights actions to vindicate the rights of people who have been falsely arrested and maliciously prosecuted. I have been litigating cases for over ten years.

4. I started my career at a large civil litigation defense firm before becoming a public defender. Following several years as a public defender, I founded a law firm and began trying civil and criminal cases in New York City. Since 1999, I have applied this extensive experience

to a specialization in police misconduct and negligence litigation. I have tried over 50 cases in and have million-dollar verdicts and have obtained many substantial six figure settlements.

5. Because I have been practicing civil rights law in New York for many years, I am fully aware of the prevailing hourly rates charged by law firms located in the Eastern and Southern Districts of New York who specialize in federal court civil rights litigation. The issue of legal fees frequently arises at settlement conferences, and I have taken it upon myself to keep myself educated as to what rates are awarded to colleagues at my level of experience in this field.

6. From both personal interactions with Mr. Norinsberg and through conversations with respective colleagues in the field of police misconduct litigation, I know that he is a formidable, highly experienced and skilled practitioner with a reputation for excellence.

7. Accordingly, Mr. Norinsberg's requested hourly rate of \$600.00 is entirely reasonable, and in line with the prevailing rates for an attorney of his caliber, experience and reputation in the Southern District.

8. Based upon my many years of experience as a lawyer practicing in this field across the State of New York, based upon my many observations and interactions with Mr. Norinsberg over the years, and based upon my knowledge of prevailing rates for attorneys of his high caliber and outstanding reputation in this district, I fully support Mr. Norinsberg's application for fees in all respects, including the requested hourly rate of \$600.00.

DATED: New York, New York
December 8, 2015



Christopher D. Galiardo